

**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF NEW JERSEY**

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UNITED STATES OF AMERICA *ex rel.*  
LAURIE SIMPSON,

Honorable Jose L. Linares  
United States District Court Judge

*Plaintiff,*  
v.

Honorable Joseph A. Dickson  
United States Magistrate Judge

BAYER CORPORATION;  
BAYER HEALTHCARE  
PHARMACEUTICALS, INC.;  
BAYER HEALTHCARE LLC; and  
BAYER AG,

Civil. No. 05-3895(JLL)(JAD)

*Defendants.*

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**[PROPOSED] AMENDED SCHEDULING ORDER**

THIS MATTER having come before the Court through joint stipulation of Plaintiff-Relator Laurie Simpson (“Plaintiff-Relator”) and Defendants Bayer Corp., Bayer Healthcare Pharmaceuticals, Inc., and Bayer Healthcare LLC (collectively, “Defendants”), requesting that the Joint Stipulation To Amend Case Schedule, entered by the Court on March 15, 2016 [ECF No. 245], be amended, and for good cause shown:

<b>Event</b>	<b>Current Deadline</b>	<b>Proposed New Deadline</b>
Document Production Completed	June 3, 2016	February 13, 2018
Privilege Logs Due	June 30, 2016	March 15, 2018
Motions to Add New Parties, Whether by Amended or Third-Party Complaint, Due	June 13, 2016	March 29, 2018
Motions to Amend Pleadings Due	June 13, 2016	March 29, 2018
Fact Discovery Completed	December 31, 2016	September 12, 2018
Plaintiff-Relator's Expert Reports Due	February 24, 2017	November 6, 2018
Bayer's Expert Reports Due	April 24, 2017	January 22, 2019
Plaintiff-Relator's Rebuttal Expert Reports Due	May 26, 2017	February 26, 2019
Expert Discovery Completed	TBD	TBD
Dispositive Motions Due	June 23, 2017	April 2, 2019
Oppositions to Dispositive Motions Due	July 21, 2017	April 30, 2019
Replies in further Support of Dispositive Motions Due	August 11, 2017	May 23, 2019
Deadline for Parties to Electronically File Dispositive Motion with the Court	August 14, 2017	May 29, 2019

Final Pre-Trial Conference	TBD	TBD
All Counsel to Meet re: Final Pre-Trial Order and Pre-trial Submissions	Ten (10) Days before Final Pre-Trial Conference	Ten (10) Days before Final Pre-Trial Conference
Final Pre-Trial Order and Pre-Trial Submissions Due	Forty-eight (48) Hours before Final Pre-Trial Conference	Forty-eight (48) Hours before Final Pre-Trial Conference

IT IS on this 23<sup>rd</sup> day of August, 2017, ORDERED THAT the Case Schedule shall be amended as follows:



The Honorable Joseph A. Dickson  
United States Magistrate Judge